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Committee ID: C90015413  
RE: 48-Hour Report, File 8/26/2015

Dear Mr. Matheson,

I am writing as counsel to Democratic Socialists of America (DSA) in response to the Commission's September 29, 2015, request for additional information related to the above referenced 48-Hour Report. Thank you for taking the time to speak with me and DSA National Director Maria Svart about this request and, more generally, the ways in which DSA should report its independent expenditures in support of Democratic presidential candidate Bernie Sanders. The letter explains how DSA will amend previous filings reporting these expenditures and how, as advised by you, DSA will report its expenditures going forward.

As a preliminary matter, let me note just how poorly the Commission's regulations and reporting systems are equipped to cope with independent, grassroots efforts such as that now being undertaken by DSA. DSA and its members have been energized by Senator Sanders' candidacy. The issues Senator Sanders raises reflect the concerns of the organization and its members. The solutions he proposes echo those the organization has supported for decades. But just as importantly, the candidacy of a self-described democratic socialist promotes the larger cause of democratic socialism, a vision of an economy and society that is run democratically to meet human needs, not to make profits for a few.

It was inevitable, therefore, that DSA and its members would seek to support a Sanders presidential campaign, but the organization was committed to doing so in a transparent way that fully complied with federal campaign finance laws. It would hardly do if an organization that criticizes the undue influence wielded upon our society by wealthy corporations and the ultra-rich were to exploit campaign finance loopholes and flout reporting obligations in the way that so many monied interests have in recent years.

Yet, DSA's relatively small, grassroots efforts do not lend themselves to the reporting systems the Commission has created. DSA is using a portion of its members' dues, contributions, and other general treasury funds to support the largely grassroots efforts of its members and activists. Activists in one DSA chapter might be reimbursed by DSA for the costs of holding a pro-Sanders event. An activist in another chapter might be reimbursed for printing DSA pro-Sanders bumper stickers. The national DSA office might run off thousands of copies of a pro-Sanders flier and mail them out in small batches to chapters and members across the country. A paid DSA staff might post a blog post supporting Sanders and explaining the ideals of democratic socialism.

These types of activities create reporting headaches for an organization like DSA. Among those problems:

-Most of DSA's efforts for Sanders are national in nature, not specifically targeted to a particular state's primary or caucus. The goal is to amplify the national conversation about Sanders and democratic socialism. Yet the current Commission reporting system treats each primary and caucus as a separate election and requires that independent

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